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Polrep #001
Walnut Avenue Lead Site
338 Walnut Ave., S.E.
Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

I. **Situation:** (As of 1500 hours, Friday, October 31, 1997)

- A. This Polrep covers the time period from 10/27-31/97. In terms of background: this Site was previously owned by Roanoke Iron and Steel, until 1986, which fabricated and painted steel for use in prisons.
- B. Assessment conducted in 1987 by Risk Science International revealed elevated levels of lead in soil.
- C. Between January and March 1988, 193,440 pounds of contaminated soil were removed from the Site and transported to GSX Hazardous Waste Facility in Barnwell, SC. Confirmatory samples collected at that time revealed lead levels remaining in soils were below regulatory limits.
- D. Property purchased by Cycle Systems at an auction in March 1988.
- E. After an assessment for the Roanoke River Flood Reduction Project, the Army Corps of Engineers referred the Site to USEPA Region III in January 1994 following the completion of an assessment that was part of the Roanoke River Flood Reduction Project.
- F. Soil and surface water samples collected during an EPA/SATA assessment in February 1994 revealed elevated levels of lead in three areas that had previously used in painting operations performed by Roanoke Iron & Bridge Company. Areas include the Former Painting Area (FPA), the Former Slag Area (FSA), and the Former Drainage Ditch (DDA).
- G. EPA drafted an Administrative Order of Consent (AOC) for Cycle Systems to address delineation and removal of contaminated soils above the 1000 mg/kg Regulatory Removal Guideline (RRC).
- H. Site inspections conducted on November 22, 1994 and March 16, 1995 prompted US EPA to include the Former Foundry Area (FFA), the River Bank Area (RBA) and Equipment Storage Area (ESA) in the AOC as well.
- I. Cycle Systems in accordance with the amended AOC dated July 29, 1996, agree to excavate the contaminated soils, treat the contaminated soils on Site and, transport treated soils to an approved landfill.

II. Actions Taken

- A. Excavation of ESA was completed. 23 Truckloads or approximately 483 tons of contaminated soil was excavated and stockpiled in FSA/FPA. Eleven confirmatory samples were collected in the ESA and the analytical results showed them to be below the 1000 mg/kg RRG.
- B. DDA excavated and 1 Truckload or 21 tons was stockpiled at FSA/FPA. Analytical results from confirmatory samples showed levels above RRG. Area covered with poly-lining for protection over weekend, awaiting further excavation and sampling.
- C. FFA excavated and 31 Truckloads or 651 tons of contaminated soils which represents approximated 85% completion, was accomplished. Material stockpiled in FSA/FPA. Five confirmatory samples were obtained and analytical results showed values below RRG.
- D. Lead contaminated soil not previously included in AOC was found inside Northeast corner of building along the northern side of the FFA. Samples collected revealed high lead levels in a 50 ft by 50 ft area. Area has to be cleared of equipment and debris material prior to excavating contaminated soil.
- E. Perimeter air monitoring revealed low dust lead levels caused by excavation. Also, personal air monitoring revealed low lead levels in exclusion zone.

III. Future Actions

- A. Continue perimeter and personal air monitoring as necessary.
- B. Excavate and re-sample DDA.
- C. Complete excavation and confirmatory sampling of FFA and begin excavation of soil in area found in the NE corner of building by mid-week.
- D. Begin treating previously stockpiled material by mid-week.

OSC and SATA to continue to monitor PRP compliance with AOC.

Shabazz, OSC
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